

**American Rivers  
The Bay Institute  
Defenders of Wildlife  
Environmental Defense Fund  
The Nature Conservancy**

July 21, 2011

Mr. Mike Connor, Commissioner  
United State Bureau of Reclamation  
1849 C Street NW  
Washington DC 20240-0001

Re: Process for completing a successful Bay-Delta Conservation Plan

Dear Commissioner Connor:

Thank you for meeting with us yesterday, and for the constructive and frank discussion related to developing a successful Bay-Delta Conservation Plan. We are writing to underscore our serious and fundamental concerns with the BDCP's analytical processes.

As you know, for the past four years our organizations have been working diligently and constructively to develop a plan that will protect and restore the ecological health of California's Sacramento-San Joaquin River Delta while simultaneously protecting communities within the Delta and providing a reliable water supply. We are encouraged that the Brown Administration has determined, along with other agencies and stakeholders, that the recently developed Effects Analysis is inadequate and needs to be redone.

While the new consulting team, with input from independent science advisors, is certain to develop an improved Effects Analysis, serious questions remain. We have not been permitted to see the consultant workplan for the EA and understand that their Analytical Framework document has not yet been completed. Unfortunately, the analytical process has been so flawed to date that fundamental changes are necessary to produce an adequate set of environmental documents (see attached memo for detailed recommendations regarding a sound analytical framework). Yet at this late date BDCP has still not even finalized its goals and objectives, so it is not possible to assess whether the Conservation Plan is likely to be satisfactory and to design new or modified measures to be more effective. The process going forward simply must meet a much higher standard for doing science-based planning.

Second, due to the delay associated with having to repeat the Effects Analysis, the BDCP schedule now calls for the revised EA to be completed concurrently with the Environmental Impact Report / Environmental Impact Statement. It does not appear then that the EA will be developed collaboratively and iteratively, as all stakeholders have previously agreed, and that a well thought out, well vetted project description will subsequently be fed into the EIR/EIS. This

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is not consistent with earlier commitments by all the parties to the BDCP to a fully iterative process.

We hope to resolve these concerns related to the BDCP's analytical processes. In addition, we have ongoing concerns regarding the purpose and scope of the EIS/EIR (see attached letter of June 11, 2010) that we would like to discuss with you at the earliest convenience.

We look forward to continuing to work with you to build a firm foundation for a successful BDCP.

Sincerely,

  
John Cain Gary Bobker  
American Rivers The Bay Institute



  
Kim Delfino Spreck Rosekrans  
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